19. Brooks has notified Bell Atlantic well in advance of its plans to provide service to new, large customers and has expressed concerns that without the appropriate actions taken by Bell Atlantic there would be insufficient network capacity to support increased customer growth. Attached to this Complaint as **Exhibits 3** and **4**, respectively, are a letter from Robert Poulton to John Griffin dated November 10, 1997, and minutes of a meeting between Brooks and Bell Atlantic, dated April 30, 1997, which memorialize Brooks' concerns that Bell Atlantic ensure adequate capacity for anticipated customers. Bell Atlantic (then NYNEX) itself recognized the importance of its providing timely and sufficient interconnection trunking to Brooks. In a letter of May 14, 1997 to Brooks Vice President Rob Shanahan, Thomas M. Dreyer, NYNEX's Director of Local Carrier Sales, wrote:

> Unforecasted growth for interconnection trunking in the local network is presenting a new set of challenges to NYNEX as well as your company.[1] Very often these challenges result in service affecting issues impacting the level of service provided to the end users. We at NYNEX are designing a process improvement initiative to address this issue...

As set forth above, however, the "issue" has not been adequately "addressed" at all.

20. In response to network problems that Brooks was experiencing, Brooks requested that written procedures be established that outline the steps the

[1] The "growth" of Brooks' need "for interconnection trunking in the local network," as should be clear from paragraph 18, above, was <u>not</u> "unforcasted" by Brooks. Brooks provided timely and adequate growth forecasts to NYNEX in the form requested, *i.e.*, on a computer spreadsheet furnished to it by NYNEX on diskette.

companies would follow in order to trouble-shoot network problems. See, e.g., **Exhibit 4** at paragraph 3; Letter with attachment from Robert Poulton to Bob Fox of Bell Atlantic, dated May 16, 1997, attached to this Complaint as **Exhibit 5**.

21. Brooks also has requested that the companies share access to their respective network data in order to monitor and evaluate traffic on each other's network to prevent blockage from happening in the future. See, e.g., Attachment 4 at paragraph 4; Letter to Bob Fox dated May 8, 1997, a true and accurate copy of which is attached to this Complaint as **Exhibit 6**.

22. Brooks has repeatedly asked Bell Atlantic to finalize a network grooming plan. Bell Atlantic has been reluctant to meet with Brooks and is reluctant to adopt a final network grooming plan. A properly designed network grooming plan is critical to developing an efficient network of networks and would provide standards to ensure that interconnection trunk groups provided by Bell Atlantic to Brooks experience a grade of service, availability and quality which is comparable to that achieved on interoffice trunks within Bell Atlantic's network and in accord with all relevant industry standards for quality, reliability and availability. Attached to this Complaint as **Exhibits 7** and **8**, respectively, are copies of a letter from Brooks to Bell Atlantic requesting a meeting to finalize network grooming and a Brooks agenda for the items that should be included in such a plan.

23. Brooks has requested that Bell Atlantic provide Brooks with alternate routing as a contingency in the event that trunks reach capacity. Bell Atlantic has not been willing to make such alternate routing arrangements for Brooks.

24. Brooks has placed numerous orders for additional outgoing trunks to handle increased traffic from Brooks customers to Bell Atlantic's customers. Under the Interconnection Agreement, Bell Atlantic is supposed to install corresponding incoming trunks to Brooks. However, since May of 1997, Bell Atlantic has not provided Brooks with a firm order commitment date (FOC) for installing new outgoing trunks and has been very slow to install incoming trunks to Brooks.

25. In response to Brooks' repeated request for additional trunks, Bell Atlantic initially stated that there were no available switch hooks to install at its Washington Street end-office that would permit new trunks to serve Brooks' switch. Subsequently, Bell Atlantic found hooks that would permit additional trunks to serve Brooks' switch. However, Bell Atlantic has still not provided sufficient trunking capacity to handle Brooks' actual and forecasted traffic.

26. On or about May 27, 1997, Brooks sent a letter to Bell Atlantic that described many of the network grievances that are described in this Complaint,

supported by documentation. A copy of that letter and supporting documentation was filed with the Commission.

27. Following the filing of that letter, Brooks met with Bell Atlantic in the hope that its service quality problems with Bell Atlantic could be worked out. In that meeting, Bell Atlantic agreed that it would regularly turn up a number of trunks on a monthly basis to account for the growth in traffic between the companies. Bell Atlantic also agreed to provide an engineering estimated completion date ("EECD") for facilities that are at capacity and that Brooks would be able to use EECDs for planning purposes. Finally, Bell Atlantic created an 800 number for network problems and agreed to provide a contact list and escalation list to trouble shoot inter-network service quality problems. See, meeting minutes for meeting between Bell Atlantic and Brooks, dated May 30, 1997, attached to this Complaint as **Exhibit 9**.

28. Notwithstanding Bell Atlantic's promises, Bell Atlantic has not regularly turned up trunks on a monthly basis since May 1997 and Brooks has never received an EECD. Brooks received a contact list, but Bell Atlantic has still not established effective standard operating procedures for dealing with network problems experienced by CLECs. Brooks called the 800 number for inter-network trouble reports but the Bell Atlantic person answering the call had little knowledge of networking. Brooks is treated in this respect as an end-user and not a peer local exchange carrier.

29. Unfortunately, the network blockage problems experienced by Brooks' customers have continued. In June of 1997, a serious routing problem in Bell Atlantic's tandem switch restricted the number of available trunks from Bell Atlantic to Brooks, resulting in network blockage for all Brooks' customers. Attached to this Complaint as **Exhibit 10** is a copy of a letter from Robert Poulton to John Griffin describing this problem. The trunking problems complained of above have continued to the present day.

30. Brooks has lost customers as a result of Bell Atlantic's poor ser ce in providing sufficient trunking to handle Brooks' traffic and its lack of commitment to solving network disruptions. Attached to this Complaint as **Exhibit 11** are copies of letters relating to customer complaints and cancellations as a result of the network blockage caused by Bell Atlantic.

31. Bell Atlantic's failure to increase network capacity and/or otherwise configure its network to provide alternative routing for increased Brooks traffic (traffic that was reflected in Brooks' forecasts to Bell Atlantic); its failure to plan for and install additional trunks as requested by Brooks; its failure to provide Brooks with firm order commitments for such trunking orders; its failure to manage and upgrade its own network, its failure to cooperate with Brooks to resolve network disruptions, and its failure to work with Brooks to finalize a joint

grooming plan have resulted in severe constraints on Brooks' ability to serve its customers and has caused Brooks to lose customers.

32. Certain Brooks customers who have experienced difficulties calling out or receiving incoming calls have canceled service with Brooks and returned to Bell Atlantic only to find out that they will be charged installation fees. As a result of Bell Atlantic's failure to provide adequate trunks, Brooks customers, who have terminated Brooks' service and returned to Bell Atlantic, have asked Brooks to reimburse them for such fees; Brooks has acquiesced to those requests for reimbursement because it understands the customers' frustrations.

## COUNT I

## BELL ATLANTIC HAS BREACHED ITS OBLIGATIONS UNDER THE INTERCONNECTION AGREEMENT

33. Brooks repeats and realleges paragraphs 1 through 34 of this Complaint.

34. Bell Atlantic's failure to expand its trunking capacity in order to take into account Brooks' anticipated customer growth is a violation of Bell Atlantic's duty under the Interconnection Agreement to "install and maintain a reliable network" to "work cooperatively to apply sound network management controls to alleviate congestion," and its duties with respect to the "administration and maintenance of trunk groups. See, Interconnection Agreement at 4.41, 4.42, 8.1 and 8.2.

35. Bell Atlantic's failure to meet with Brooks to finalize a network grooming plan is a violation of Sections 8.1 and 8.2 of the Interconnection Agreement. Bell Atlantic's failure to provide network service quality reports is a violation of Section 8.2 of the Interconnection Agreement. Brooks believes that if such quality service reports were made available they would reveal that Bell Atlantic is not providing Brooks with a network grade of service that Bell Atlantic provides itself.

36. Bell Atlantic's failure to perform its duties under the Interconnection Agreement have caused Brooks to lose customers and pay installation fees charged by Bell Atlantic.

## COUNT 2

## BELL ATLANTIC'S SERVICE QUALITY PERFORMANCE TO BROOKS IS UNJUST, INSUFFICIENT, UNREASONABLE AND DISCRIMINATORY UNDER RHODE ISLAND LAW

37. Brooks repeats and realleges paragraphs 1 through 36 of this Complaint.

38. Section 39-4-10 of the Rhode Island General Laws vests Commission with jurisdiction over Bell Atlantic's provision of unreasonable and inadequate services to Brooks and provides as follows:

> **Orders as to unreasonable practices or inadequate services.** – If, upon a hearing and investigation had under the provisions of this chapter, the division of public utilities and carriers shall find that any regulation, measurement, practice, act, or service or any public utility is unjust, unreasonable, insufficient, preferential, unjustly discriminatory, or otherwise in violation of any of the provisions of chapters 1 to 5, inclusive, of this title, or that any service of any such public utility is inadequate or that any service which can be reasonably demanded cannot be obtained, the division shall have power to substitute therefor such other regulations, measurements, practices, service, or acts, and to make such order respecting, and such changes in the regulations, measurements, practices, service, or acts, as shall be just and reasonable, and the power to order refunds as provide for in Section 39-3-13.1.

39. For reasons set forth above, Bell Atlantic's provision of interconnection trunks to Brooks is unjust, unreasonable, and insufficient.

40. Bell Atlantic's provision of interconnection trunks to Brooks is discriminatory. Bell Atlantic is required to provide Brooks with interconnection trunk groups that have a grade of service, availability and quality comparable to that achieved on inter-office trunks within its own network. Bell Atlantic has not provided the data to demonstrate whether this parity exists.[2]

41. Bell Atlantic's provision of interconnection trunks is inadequate and is a service which has been reasonably demanded but which cannot be obtained by Brooks.

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[2] It should be noted that the FCC's conditions to the Bell Atlantic - NYNEX merger were designed to address issues of network parity by requiring Bell Atlantic to make performance reports relating to its network services. Bell Atlantic is not satisfying the merger conditions.

## COUNT 3

## BELL ATLANTIC'S FAILURE TO PROVIDE BROOKS WITH ADEQUATE TRUNKING FACILITIES, WHILE PROVIDING THEM TO ITSELF, VIOLATES FEDERAL LAW.

42. Brooks repeats and realleges paragraphs 1 through 41 of this Complaint.

43. Section 251(c)(2) of the Telecommunications Act of 1996 provides that the incumbent local exchange carrier has the following duty with respect to interconnection:

> (2) INTERCONNECTION. – The duty to provide for the facilities and equipment of any requesting telecommunications carrier, interconnection with the local exchange carrier's network...
>
> > (D) on rates, terms, and conditions that are just, reasonable and non-discriminatory, in accordance with the terms and conditions of the agreement and the requirements of this section and section 252.
> >
> > (emphasis supplied)

44. Under the FCC's Final Rules, 47 CFR Sec. 51.305, Interconnection,

> (a) An incumbent LEC shall provide, for the facilities and equipment of any requesting telecommunications carrier, interconnection with the incumbent LEC's network...
>
> (3) that is at a level of quality that is equal to that which the incumbent LEC provides itself, a subsidiary, an affiliate, or any other party, except as provided in paragraph (4) of this section. At a minimum, this requires an incumbent LEC to design interconnection facilities to meet the same technical criteria and service standards that are used within the incumbent LEC's network. This obligation is not limited to a consideration of service quality as perceived by end users, and includes, but is not limited to, service quality as perceived by the requesting telecommunications carrier;

(4) that, if so requested by a telecommunications carrier and to the extent technically feasible, is superior in quality to that provided by the incumbent LEC to itself or to any subsidiary, affiliate, or any other party to which the incumbent LEC provides interconnection. Nothing in this section prohibits an incumbent LEC from providing interconnection that is lesser in quality at the sole request of the requesting telecommunications carrier; and,

(5) on terms and conditions that are just, reasonable and nondiscriminatory in accordance with the terms and conditions of any agreement, the requirements of sections 251 and 252 of the Act, and the Commission's rules including, but not limited to, offering such terms and conditions equally to all requesting telecommunications carriers, and offering such terms and conditions that are no less favorable than the terms and conditions the incumbent LEC provides such interconnection to itself. This includes, but is not limited to, the time within which the incumbent LEC provides such interconnection.

45. Bell Atlantic's failure and refusal to provide adequate and timely trunking to Brooks violates the above referenced statute and Regulation.

## V. RELIEF REQUESTED

WHEREFORE, Brooks respectfully requests that the Commission require Bell Atlantic to file a prompt response to this complaint; that it speedily conduct a hearing thereon; and that after such hearing it order Bell Atlantic to:

1. Immediately implement a network solution;
2. Immediately install whatever hooks are available;
3. Implement other network solutions, including translation and routing changes to alternative carriers at no expense to Brooks;
4. Provide Brooks with real time access to Bell Atlantic's network statistical data so that the parties can work and plan together to avoid network congestion and address network disruptions in the future;

5. Cease and desist from charging installation fees to customers who have left Brooks as a result of insufficient trunking;
6. Provide Brooks with refunds for fees paid by Brooks in accordance with RI GL, 39-3-13.1;
7. Reimburse Brooks for payments made on behalf of customers who switched back to Bell Atlantic;
8. Work with Brooks to finalize and implement a network grooming plan by a date certain;
9. Provide monthly reports to the Commission regarding the above requirements; and
10. Such other relief to which the Commission finds Brooks is entitled.

Respectfully Submitted,
Brooks Fiber Communications of Rhode Island
By its Counsel;

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Dated: December 4, 1997

Exhibit 1

## SCHEDULE 8.2 NYNEX Intervals for Installation

Service Order Standard Intervals

| | Number of DS1Systems | Standard Interval (Business Days) |
|---|---|---|
| Establishment of New Trunk Groups | | |
| | 1-10 | 60 |
| | over 10 | negotiated |
| Additions to Existent Trunk Groups | | |
| | 1-4 | 30 |
| | over 4 | negotiated |

Exhibit 2

a. Forecast provided in August 1996.
b. Forecast provided in May 1997;
c. Forecast provided in October 1997;
d. Forecast provided in November 1997.

Lata_____

Company_____ Brooks Fiber Properties

Clec Forecast for the period (QQYY) _____ to _____ State_____

| Wire Ctr. | CLLI | Serving Tandem CLLI | Minutes of use EO Orig | Percent Tfc Clec to NYNEX | Minutes of use EO Term | Minutes of use TDM Orig | Percent Tfc Clec to Nynex | Minutes of use Tdm Term | IOF DS1 Tdm EO | IOF DS3 Tdm EO | IOF DS1 POP TDM EO | NYNEX Cages Eqpt DS3 | Facs Cbl NYNEX Cages | Number Port Qty of Port #s | Loop Plant QTY SVGALS |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| PRVDRICEDS0 | | PRVDRI003GT | | | | | | | | | | | | 1278 | 1065 |
| | 911 | PRVDRI003GT | XX | 100 | XX | XX | XX | XX | 1 | | | | | | |
| | 911 | PRVDRI003GT | XX | 100 | XX | XX | XX | XX | 1 | | | | | | |
| | MF 2W | PRVDRI003GT | 500 | 60 | 500 | 500 | 60 | 500 | 1 | | | | | | |
| | SS7 2W | PRVDRI003GT | 2680 | 60 | 2680 | 2680 | 60 | 2680 | 4 | | | | | | |
| | SS7 1W I | PRVDRI003GT | 0 | 0 | 12900 | 12900 | 0 | 0 | 10 | | | | | | |
| | SS7 1W O | PRVDRI003GT | 12900 | 100 | 0 | 0 | 100 | 12900 | 10 | 1 | | 12 inst | | | |
| ALT PROV | SS7 | NWHNCT0304W | XX | XX | XX | XX | XX | XX | 1 | | | | | | |
| ALT PROV | SS7 | WTRBCT0002W | XX | XX | XX | XX | XX | XX | 1 | | | | | | |
| ALT PROV | 1W I | HWHNCT02B1t | 0 | 0 | 1000 | 1000 | 0 | 0 | 2 | | | | | | |
| ALT PROV | 1W0 | HWHNCT02B1t | 1000 | 100 | 0 | 0 | 100 | 1000 | 2 | 1 | | 12 inst | | | |

Lata_____ Page _____ of _____

Company_____ Brooks Fiber Properties

Clec Forecast for the period (QQYY) _____ to _____ State_____

| Wire Ctr. PRVDRICEDS0 | CLLI | Serving Tandem CLLI PRVDRI003GT | Minutes of use EO Orig | Percent Tfc Clec to NYNEX | Minutes of use EO Term | Minutes of use TDM Orig | Percent Tfc Clec to Nynex | Minutes of use Tdm Term | IOF DS1 Tdm EO | IOF DS3 Tdm EO | IOF DS1 POP TDM EO | IOF DS3 POP TDM EO | NYNEX Cages Eqpt DS3 | Facs Cbl NYNEX Cages | Number Port Qty of Port #s 51120 | Loop Plant QTY SVGALS 42600 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | 911 | PRVDRI003GT | XX | 100 | XX | XX | XX | XX | 1 | | | | | | | |
| | 911 | PRVDRI003GT | XX | 100 | XX | XX | XX | XX | 1 | | | | | | | |
| | MF 2W | PRVDRI003GT | 7390 | 60 | 7390 | 7390 | 60 | 7390 | 10 | | | | | | | |
| | SS7 2W | PRVDRI003GT | 9670 | 60 | 9670 | 9670 | 60 | 9670 | 10 | | | | | | | |
| | SS7 1W I | PRVDRI003GT | 0 | 0 | 80740 | 80740 | 0 | 0 | 63 | | | | | | | |
| | SS7 1W O | PRVDRI003GT | 80740 | 100 | 0 | 0 | 100 | 80740 | 63 | 6 | | | 24 inst | | | |
| ALT PROV | SS7 | NWHNCT0304 | XX | XX | XX | XX | XX | XX | 1 | | | | | | | |
| ALT PROV | SS7 | WTRBCT0002W | XX | XX | XX | XX | XX | XX | 1 | | | | | | | |
| ALT PROV | 1W I | HWHNCT02B1t | 0 | 0 | 7670 | 7670 | 0 | 0 | 7 | | | | | | | |
| ALT PROV | 1W0 | HWHNCT02B1t | 7670 | 100 | 0 | 0 | 100 | 7670 | 7 | 1 | | | 24 inst | | | |

Lata_____ Page _____ of _____

Company____ Brooks Fiber Properties

Clec Forecast for the period (QQYY) _____ to _____ State_____

| Wire Ctr. PRVDRICEDS0 | CLLI | Serving Tandem CLLI PRVDRI003GT | Minutes of use EO Orig | Percent Tfc Clec to NYNEX | Minutes of use EO Term | Minutes of use TDM Orig | Percent Tfc Clec to Nynex | Minutes of use Tdm Term | IOF DS1 Tdm EO | IOF DS3 Tdm EO | IOF DS1 POP TDM EO | IOF DS3 POP TDM EO | NYNEX Cages Eqpt DS3 | Facs Cbl NYNEX Cages | Number Port Qty of Port #s 3834 | Loop Plant QTY SVGALS 3195 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | 911 | PRVDRI003GT | XX | 100 | XX | XX | XX | XX | 1 | | | | | | | |
| | 911 | PRVDRI003GT | XX | 100 | XX | XX | XX | XX | 1 | | | | | | | |
| | MF 2W | PRVDRI003GT | 550 | 60 | 550 | 550 | 60 | 550 | 2 | | | | | | | |
| | SS7 2W | PRVDRI003GT | 3070 | 60 | 3070 | 3070 | 60 | 3070 | 5 | | | | | | | |
| | SS7 1W I | PRVDRI003GT | 0 | 0 | 25830 | 25830 | 0 | 0 | 20 | | | | | | | |
| | SS7 1W O | PRVDRI003GT | 25830 | 100 | 0 | 0 | 100 | 25830 | 20 | 2 | | | 24 inst | | | |
| ALT PROV | SS7 | NWHNCT0304 | XX | XX | XX | XX | XX | XX | 1 | | | | | | | |
| ALT PROV | SS7 | WTRBCT0002 | XX | XX | XX | XX | XX | XX | 1 | | | | | | | |
| ALT PROV | 1W I | HWHNCT02B1I | 0 | 0 | 1500 | 1500 | 0 | 0 | 2 | | | | | | | |
| ALT PROV | 1W0 | HWHNCT02B1I | 1500 | 100 | 0 | 0 | 100 | 1500 | 2 | 1 | | | 24 ist | | | |

Lata_____ Page _____ of _____

Company____ Brooks Fiber Properties

Clec Forecast for the period (QQYY) _____ to _____ State_____

| Wire Ctr. | CLLI | Serving Tandem CLLI | Minutes of use EO Orig | Percent Tfc Clec to NYNEX | Minutes of use EO Term | Minutes of use TDM Orig | Percent Tfc Clec to Nynex | Minutes of use Tdm Term | IOF DS1 Tdm EO | IOF DS3 Tdm EO | IOF DS1 POP TDM EO | IOF DS3 POP TDM EO | NYNEX Cages Eqpt DS3 | Facs Cbl NYNEX Cages | Number Port Qty of Port #s | Loop Plant QTY SVGALS |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| PRVDRICEDS0 | | PRVDRI003GT | | | | | | | | | | | | | 7668 | 6390 |
| | 911 | PRVDRI003GT | XX | 100 | XX | XX | XX | XX | 1 | | | | | | | |
| | 911 | PRVDRI003GT | XX | 100 | XX | XX | XX | XX | 1 | | | | | | | |
| | MF 2W | PRVDRI003GT | 845 | 60 | 845 | 845 | 60 | 845 | 3 | | | | | | | |
| | SS7 2W | PRVDRI003GT | 3450 | 60 | 3450 | 3450 | 60 | 3450 | 5 | | | | | | | |
| | SS7 1W I | PRVDRI003GT | 0 | 0 | 28330 | 28330 | 0 | 0 | 22 | | | | | | | |
| | SS7 1W | PRVDRI003GT | 28330 | 100 | 0 | 0 | 100 | 28330 | 22 | 2 | | | 24 inst | | | |
| ALT Prov | SS7 | NWHNCT0304W | XX | XX | XX | XX | XX | XX | 1 | | | | | | | |
| ALT Prov | SS7 | WTRBCT0002W | XX | XX | XX | XX | XX | XX | 1 | | | | | | | |
| ALT Prov | 1W I | HWHNCT02B1t | 0 | 0 | 2000 | 2000 | 0 | 0 | 2 | | | | | | | |
| ALT Prov | 1W0 | HWHNCT02B1t | 2000 | 100 | 0 | 0 | 100 | 2000 | 2 | 1 | | | 24 inst | | | |

Lata_____ Page _____ of _____

Company____ Brooks Fiber Properties

Clec Forecast for the period (QQYY) _____ to _____ State_____

| Wire Ctr. | CLLI | Serving Tandem CLLI | Minutes of use EO Orig | Percent Tfc Clec to NYNEX | Minutes of use EO Term | Minutes of use TDM Orig | Percent Tfc Clec to Nynex | Minutes of use Tdm Term | IOF DS1 Tdm EO | IOF DS3 Tdm EO | IOF DS1 POP TDM EO | IOF DS3 POP TDM EO | NYNEX Cages Eqpt DS3 | Facs Cbl NYNEX Cages | Number Port Qty of Port #s | Loop Plant QTY SVGALS |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| PRVDRICEDS0 | | PRVDRI003GT | | | | | | | | | | | | | 12780 | 10650 |
| | 911 | PRVDRI003GT | XX | 100 | XX | XX | XX | XX | 1 | | | | | | | |
| | 911 | PRVDRI003GT | XX | 100 | XX | XX | XX | XX | 1 | | | | | | | |
| | MF 2W | PRVDRI003GT | 1200 | 60 | 1200 | 1200 | 60 | 1200 | 2 | | | | | | | |
| | SS7 2W | PRVDRI003GT | 3840 | 60 | 3840 | 60 | 60 | 3840 | 6 | | | | | | | |
| | SS7 1W I | PRVDRI003GT | 0 | 0 | 30665 | 30665 | 0 | 0 | 24 | | | | | | | |
| | SS7 1W O | PRVDRI003GT | 30665 | 100 | 0 | 0 | 100 | 30665 | 24 | 2 | | | 24 inst | | | |
| ALT PROV | SS7 | NWHNCT0304 | XX | XX | XX | XX | XX | XX | 1 | | | | | | | |
| ALT PROV | SS7 | WTRBCT0002 | XX | XX | XX | XX | XX | XX | 1 | | | | | | | |
| ALT PROV | 1W I | HWHNCT02B1t | 0 | 0 | 1200 | 1200 | 0 | 0 | 3 | | | | | | | |
| ALT PROV | 1W0 | HWHNCT02B1t | 1200 | 100 | 0 | 0 | 100 | 1200 | 3 | 1 | | | 24 inst | | | |

Lata_____ Page _____ of _____

Company____ Brooks Fiber Properties

Clec Forecast for the period (QQYY) _____ to _____ State_____

| Wire Ctr. | CLLI | Serving Tandem CLLI | Minutes of use EO Orig | Percent Tfc Clec to NYNEX | Minutes of use EO Term | Minutes of use TDM Orig | Percent Tfc Clec to Nynex | Minutes of use Tdm Term | IOF DS1 Tdm EO | IOF DS3 Tdm EO | IOF DS1 POP TDM EO | IOF DS3 POP TDM EO | NYNEX Cages Eqpt DS3 | Facs Cbl NYNEX Cages | Number Port Qty of Port #s | Loop Plant QTY SVGALS |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| PRVDRICEDS0 | | PRVDRI003GT | | | | | | | | | | | | | 17380 | 14484 |
| | 911 | PRVDRI003GT | XX | 100 | XX | XX | XX | XX | 1 | | | | | | | |
| | 911 | PRVDRI003GT | XX | 100 | XX | XX | XX | XX | 1 | | | | | | | |
| | MF 2W | PRVDRI003GT | 1560 | 60 | 1560 | 1560 | 60 | 1560 | 3 | | | | | | | |
| | SS7 2W | PRVDRI003GT | 4230 | 60 | 4230 | 4230 | 60 | 4230 | 3 | | | | | | | |
| | SS7 1W I | PRVDRI003GT | 0 | 0 | 33600 | 33600 | 0 | 0 | 27 | | | | | | | |
| | SS7 1W O | PRVDRI003GT | 33600 | 100 | 0 | 0 | 100 | 33600 | 27 | 3 | | | 24 inst | | | |
| ALT PROV | SS7 | NWHNCT0304 | XX | XX | XX | XX | XX | XX | 1 | | | | | | | |
| ALT PROV | SS7 | WTRBCT0002 | XX | XX | XX | XX | XX | XX | 1 | | | | | | | |
| ALT PROV | 1W I | HWHNCT02B1t | 0 | 0 | 2605 | 2605 | 0 | 0 | 3 | | | | | | | |
| ALT PROV | 1W0 | HWHNCT02B1t | 2605 | 100 | 0 | 0 | 100 | 2605 | 3 | 1 | | | 24 inst | | | |

Lata_____ Page _____ of _____

Company____ Brooks Fiber Properties

Clec Forecast for the period (QQYY) _____ to _____ State_____

| Wire Ctr. PRVDRICEDS0 | CLLI | Serving Tandem CLLI PRVDRI003GT | Minutes of use EO Orig | Percent Tfc Clec to NYNEX | Minutes of use EO Term | Minutes of use TDM Orig | Percent Tfc Clec to Nynex | Minutes of use Tdm Term | IOF DS1 Tdm EO | IOF DS3 Tdm EO | IOF DS1 POP TDM EO | IOF DS3 POP TDM EO | NYNEX Cages Eqpt DS3 | Facs Cbl NYNEX Cages | Number Port Qty of Port #s 21981 | Loop Plant QTY SVGALS 18318 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | 911 | PRVDRI003GT | XX | 100 | XX | XX | XX | XX | 1 | | | | | | | |
| | 911 | PRVDRI003GT | XX | 100 | XX | XX | XX | XX | 1 | | | | | | | |
| | MF 2W | PRVDRI003GT | 1920 | 60 | 1920 | 1920 | 60 | 1920 | 3 | | | | | | | |
| | SS7 2W | PRVDRI003GT | 4610 | 60 | 4610 | 4610 | 60 | 4610 | 7 | | | | | | | |
| | SS7 1W I | PRVDRI003GT | 0 | 0 | 36800 | 36800 | 0 | 0 | 29 | | | | | | | |
| | SS7 1W O | PRVDRI003GT | 36800 | 100 | 0 | 0 | 100 | 36800 | 29 | 3 | | | 24 inst | | | |
| ALT PROV | SS7 | NWHNCT0304 | XX | XX | XX | XX | XX | XX | 1 | | | | | | | |
| ALT PROV | SS7 | WTRBCT0002W | XX | XX | XX | XX | XX | XX | 1 | | | | | | | |
| ALT PROV | 1W I | HWHNCT02B1t | 0 | 0 | 2800 | 2800 | 0 | 0 | 3 | | | | | | | |
| ALT PROV | 1W0 | HWHNCT02B1t | 2800 | 100 | 0 | 0 | 100 | 2800 | 3 | 1 | | | 24 inst | | | |

Lata_____ Page _____ of _____

Company____ Brooks Fiber Properties

Clec Forecast for the period (QQYY) _____ to _____ State_____

| Wire Ctr. PRVDRICEDS0 | CLLI | Serving Tandem CLLI PRVDRI003GT | Minutes of use EO Orig | Percent Tfc Clec to NYNEX | Minutes of use EO Term | Minutes of use TDM Orig | Percent Tfc Clec to Nynex | Minutes of use Tdm Term | IOF DS1 Tdm EO 24976 | IOF DS3 Tdm EO | IOF DS1 POP TDM EO | IOF DS3 POP TDM EO | NYNEX Cages Eqpt DS3 | Facs Cbl NYNEX Cages | Number Port Qty of Port #s | Loop Plant QTY SVGALS 20814 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | 911 | PRVDRI003GT | XX | 100 | XX | XX | XX | XX | 1 | | | | | | | |
| | 911 | PRVDRI003GT | XX | 100 | XX | XX | XX | XX | 1 | | | | | | | |
| | MF 2W | PRVDRI003GT | 2310 | 60 | 2310 | 2310 | 60 | 2310 | 4 | | | | | | | |
| | SS7 2W | PRVDRI003GT | 5000 | 60 | 5000 | 5000 | 60 | 5000 | 7 | | | | | | | |
| | SS7 1W I | PRVDRI003GT | 0 | 0 | 40000 | 40000 | 0 | 0 | 32 | | | | | | | |
| | SS7 1W O | PRVDRI003GT | 40000 | 100 | 0 | 0 | 100 | 40000 | 32 | 3 | | | 24 inst | | | |
| ALT PROV | SS7 | NWHNCT0304 | XX | XX | XX | XX | XX | XX | 1 | | | | | | | |
| ALT PROV | SS7 | WTRBCT0002 | XX | XX | XX | XX | XX | XX | 1 | | | | | | | |
| ALT PROV | 1W I | HWHNCT02B1I | 0 | 0 | 3010 | 3010 | 0 | 0 | 3 | | | | | | | |
| ALT PROV | 1W0 | HWHNCT02B1I | 3010 | 100 | 0 | 0 | 100 | 3010 | 3 | 1 | | | 24 inst | | | |

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Company____ Brooks Fiber Properties

Clec Forecast for the period (QQYY) _____ to _____ State_____

| Wire Ctr. | CLLI | Serving Tandem CLLI | Minutes of use EO Orig | Percent Tfc Clec to NYNEX | Minutes of use EO Term | Minutes of use TDM Orig | Percent Tfc Clec to Nynex | Minutes of use Tdm Term | IOF DS1 Tdm EO | IOF DS3 Tdm EO | IOF DS1 POP TDM EO | IOF DS3 POP TDM EO | NYNEX Cages Eqpt DS3 | Facs Cbl NYNEX Cages | Number Port Qty of Port #s | Loop Plant QTY SVGALS |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| PRVDRICEDS0 | | PRVDRI003GT | | | | | | | | | | | | | 28116 | 23430 |
| | 911 | PRVDRI003GT | XX | 100 | XX | XX | XX | XX | 1 | | | | | | | |
| | 911 | PRVDRI003GT | XX | 100 | XX | XX | XX | XX | 1 | | | | | | | |
| | MF 2W | PRVDRI003GT | 2680 | 60 | 2680 | 2680 | 60 | 2680 | 4 | | | | | | | |
| | SS7 2W | PRVDRI003GT | 5400 | 60 | 5400 | 5400 | 60 | 5400 | 8 | | | | | | | |
| | SS7 1W I | PRVDRI003GT | 0 | 0 | 44000 | 44000 | 0 | 0 | 35 | | | | | | | |
| | SS7 1W O | PRVDRI003GT | 44000 | 100 | 0 | 0 | 100 | 44000 | 35 | 3 | | | 24 inst | | | |
| ALT PROV | SS7 | NWHNCT0304 | XX | XX | XX | XX | XX | XX | 1 | | | | | | | |
| ALT PROV | SS7 | WTRBCT0002 | XX | XX | XX | XX | XX | XX | 1 | | | | | | | |
| ALT PROV | 1W I | HWHNCT02B1I | 0 | 0 | 3215 | 3215 | 0 | 0 | 3 | | | | | | | |
| ALT PROV | 1W0 | HWHNCT02B1I | 3215 | 100 | 0 | 0 | 100 | 3215 | 3 | 1 | | | 24 inst | | | |

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Company____ Brooks Fiber Properties

Clec Forecast for the period (QQYY) _____ to _____ State_____

| Wire Ctr CLLI | | Serving Tandem CLLI | Minutes of use EO Orig | Percent Tfc Clec to NYNEX | Minutes of use EO Term | Minutes of use TDM Orig | Percent Tfc Clec to Nynex | Minutes of use Tdm Term | IOF DS1 Tdm EO | IOF DS3 Tdm EO | IOF DS1 POP TDM EO | IOF DS3 POP TDM EO | NYNEX Cages Eqpt DS3 | Facs Cbl NYNEX Cages | Number Port Qty of Port #s | Loop Plant QTY SVGALS |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| PRVDRICEDS0 | | PRVDRI003GT | | | | | | | | | | | | | 31950 | 26625 |
| | 911 | PRVDRI003GT | XX | 100 | XX | XX | XX | XX | 1 | | | | | | | |
| | 911 | PRVDRI003GT | XX | 100 | XX | XX | XX | XX | 1 | | | | | | | |
| | MF 2W | PRVDRI003GT | 3070 | 60 | 3070 | 3070 | 60 | 3070 | 5 | | | | | | | |
| | SS7 2W | PRVDRI003GT | 5800 | 60 | 5860 | 5860 | 60 | 5860 | 8 | | | | | | | |
| | SS7 1W I | PRVDRI003GT | 0 | 0 | 48000 | 48000 | 0 | 0 | 38 | | | | | | | |
| | SS7 1W O | PRVDRI003GT | 48000 | 100 | 0 | 0 | 100 | 48000 | 38 | 4 | | | 24 inst | | | |
| ALT PROV | SS7 | NWHNCT0304 | XX | XX | XX | XX | XX | XX | 1 | | | | | | | |
| ALT PROV | SS7 | WTRBCT0002 | XX | XX | XX | XX | XX | XX | 1 | | | | | | | |
| ALT PROV | 1W I | HWHNCT02B1t | 0 | 0 | 3430 | 3430 | 0 | 0 | 4 | | | | | | | |
| ALT PROV | 1W0 | HWHNCT02B1t | 3430 | 100 | 0 | 0 | 100 | 3430 | 4 | 1 | | | 24 inst | | | |

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Company____ Brooks Fiber Properties

Clec Forecast for the period (QQYY) _____ to _____ State_____

| Wire Ctr. PRVDRICEDS0 | CLLI | Serving Tandem CLLI PRVDRI003GT | Minutes of use EO Orig | Percent Tfc Clec to NYNEX | Minutes of use EO Term | Minutes of use TDM Orig | Percent Tfc Clec to Nynex | Minutes of use Tdm Term | IOF DS1 Tdm EO | IOF DS3 Tdm EO | IOF DS1 POP TDM EO | IOF DS3 POP TDM EO | NYNEX Cages Eqpt DS3 | Facs Cbl NYNEX Cages | Number Port Qty of Port #s 35784 | Loop Plant QTY SVGALS 29820 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | 911 | PRVDRI003GT | XX | 100 | XX | XX | XX | XX | 1 | | | | | | | |
| | 911 | PRVDRI003GT | XX | 100 | XX | XX | XX | XX | 1 | | | | | | | |
| | MF 2W | PRVDRI003GT | 3455 | 60 | 3450 | 3450 | 60 | 3450 | 5 | | | | | | | |
| | SS7 2W | PRVDRI003GT | 6200 | 60 | 6200 | 6200 | 60 | 6200 | 9 | | | | | | | |
| | SS7 1W I | PRVDRI003GT | 0 | 0 | 50400 | 50400 | 0 | 0 | 40 | | | | | | | |
| | SS7 1W O | PRVDRI003GT | 50400 | 100 | 50400 | 50400 | 100 | 50400 | 40 | 4 | | | 24 inst | | | |
| ALT PROV | SS7 | NWHNCT0304 | XX | XX | XX | XX | XX | XX | 1 | | | | | | | |
| ALT PROV | SS7 | WTRBCT0002 | XX | XX | XX | XX | XX | XX | 1 | | | | | | | |
| ALT PROV | 1W I | HWHNCT02B1( | 0 | 0 | 3640 | 3640 | 0 | 0 | 4 | | | | | | | |
| ALT PROV | 1W0 | HWHNCT02B1( | 3640 | 100 | 0 | 0 | 100 | 3640 | 4 | 1 | | | 24 inst | | | |

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Company____ Brooks Fiber Properties

Clec Forecast for the period (QQYY) _____ to _____ State_____

| Wire Ctr. | CLLI | Serving Tandem CLLI | Minutes of use EO Orig | Percent Tfc Clec to NYNEX | Minutes of use EO Term | Minutes of use TDM Orig | Percent Tfc Clec to Nynex | Minutes of use Tdm Term | IOF DS1 Tdm EO | IOF DS3 Tdm EO | IOF DS1 POP TDM EO | IOF DS3 POP TDM EO | NYNEX Cages Eqpt DS3 | Facs Cbl NYNEX Cages | Number Port Qty of Port #s | Loop Plant QTY SVGALS |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| PRVDRICEDS0 | | PRVDRI003GT | | | | | | | | | | | | | 38340 | 31950 |
| | 911 | PRVDRI003GT | XX | 100 | XX | XX | XX | XX | 1 | | | | | | | |
| | 911 | PRVDRI003GT | XX | 100 | XX | XX | XX | XX | 1 | | | | | | | |
| | MF 2W | PRVDRI003GT | 3840 | 60 | 3840 | 3840 | 60 | 3840 | 6 | | | | | | | |
| | SS7 2W | PRVDRI003GT | 6600 | 60 | 6600 | 6600 | 60 | 6600 | 9 | | | | | | | |
| | SS7 1W I | PRVDRI003GT | 0 | 0 | 52800 | 52800 | 0 | 0 | 42 | | | | | | | |
| | SS7 1W O | PRVDRI003GT | 52800 | 100 | 0 | 0 | 100 | 52800 | 42 | 4 | | | 24 inst | | | |
| ALT PROV | SS7 | NWHNCT0304 | XX | XX | XX | XX | XX | XX | 1 | | | | | | | |
| ALT PROV | SS7 | WTRBCT0002 | XX | XX | XX | XX | XX | XX | 1 | | | | | | | |
| ALT PROV | 1W I | HWHNCT02B1t | 0 | 0 | 3950 | 3950 | 0 | 0 | 4 | | | | | | | |
| ALT PROV | 1W0 | HWHNCT02B1t | 3950 | 100 | 0 | 0 | 100 | 3950 | 4 | 1 | | | 24 inst | | | |